

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

FILED

OCT 10 2017

Clerk, U.S. District Court  
Texas Eastern

UNITED STATES OF AMERICA

§

v.

§

No. 4:17CR 162  
Judge Mazzant

ARONGKRON MALASUKUM

§

**ELEMENTS OF THE OFFENSE**

**Arongkron Malasukum**, you are charged in Count One of the Information filed in the Eastern District of Texas with Unlawful Purchase and Sale of Endangered Wildlife in Interstate and Foreign Commerce in Violation of the Endangered Species Act, 16 U.S.C. §§ 3372(a)(1) and 3373(d)(1)(B). The following are the essential elements of the offense that the government must prove, beyond a reasonable doubt, before you could be convicted, but which you must admit if your plea is to be accepted.

**16 U.S.C. §§ 3372(a)(1) and 3373(d)(1)(B)**

First: That the defendant knowingly engaged in conduct involving the receipt, acquisition, purchase or transport of wildlife in interstate or foreign commerce;

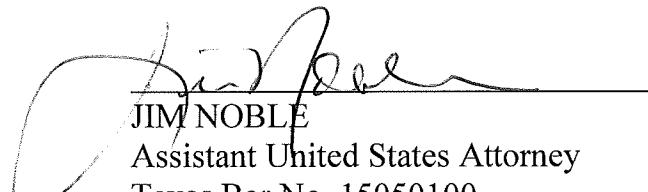
Second: That the wildlife had a market value in excess of \$350.00;

Third: That the wildlife had been possessed, transported or sold in violation of the laws and regulations of the United States; and,

Fourth: That the defendant knew that the wildlife had been possessed, transported or sold in violation of the laws and regulations of the United States.

Respectfully submitted,

BRIT FEATHERSTON  
ACTING UNITED STATES ATTORNEY



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